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Rachel Perillo

September 6, 2022

By ECF

Hon. Jesse M. Furman
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Mustapha Raji
19 Cr. 870 (JMF)

Dear Judge Furman:

I am the attorney for Mustapha Raji, the defendant in the above-named matter. This letter is respectfully submitted in response to the government's motion *in limine* filed on September 1, 2022 (Dkt. # 94).

In its motion, the government seeks to preclude the defendant from introducing the following evidence at trial:

1. Evidence and argument that victims of the charged scheme are to blame for having acted negligently or gullibly;
2. Evidence and argument concerning the potential punishment or consequences of conviction;
3. Evidence and argument concerning the defendant's familial background, race, health, age, religion, and other personal factors unconnected to guilt.

With respect to the first two categories of evidence, Mr. Raji confirms that he will not (1) argue that the victims are to blame for having acted negligently or gullibly; or (2) present evidence or argument concerning the potential punishment or consequences he faces if convicted.

With respect to the third category of evidence, Mr. Raji agrees that he will not present evidence or argument concerning his familial background, race, heath, age, religion, or other

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personal factors unconnected to guilt. However, Mr. Raji reserves the right to present relevant testimony and/or evidence in the event that he testifies. Additionally, the parties have stipulated that the government may introduce certain records related to Canadian corporations, and if such evidence is introduced, Mr. Raji reserves the right to introduce the fact that he is a Canadian citizen.

The Court's time and attention to this matter is appreciated.

Respectfully submitted,
/s/
Jeremy Schneider

cc: AUSA Catherine Ghosh
AUSA Jilan Kamal
AUSA Robert Sobelman

By ECF